

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
)  
Telecommunications Relay Service )  
and Speech-to-Speech Services ) Docket 98-67  
for Individuals with Hearing and ) Docket 03-123  
Speech Disabilities

To: The Commission

**ANNUAL REPORT ON PROGRESS OF MEETING WAIVED  
REQUIREMENTS**

Communication Access Center for the Deaf and Hard of Hearing  
("CAC") provides this annual report as mandated by Commission's Second  
Report and Order on its progress toward meeting certain  
Telecommunications Relay Service ("TRS") requirements which have been  
waived for Internet Protocol Relay Services ("IP") and Video Relay Service  
("VRS").

*Equal Access to Interexchange carriers (VRS)*

CAC believes that equal access to different interexchange carriers is not required with VRS because VRS users do not pay for long distance calls. In addition, consumer choice is maintained because VRS users can choose between several VRS providers and can in fact choose a different VRS provider for every individual call. It would be appropriate to offer users a choice of carriers when billing for long distance calls becomes a requirement.

*Pay-per-call service (900 numbers) (IP and VRS)*

This type of call is user paid and requires the Automatic Numbering Information (ANI) for billing purposes. The technology is not in place at this time. While CAC is not a proponent of registration, information gathered at the time of registration could include the billing information that would allow pay-per-calls to be user billed.

*VCO-to-TTY, HCO-to-TTY & VCO-to-VCO, HCO-to-HCO (IP and VRS)*

CAC has and is investing the use of new technology that would allow us to provide these types of services as stand-alone offerings. However, we have not had a large demand for those services and are reluctant to invest

time, effort and financial resources to deploy those services for what we view as limited potential return.

#### *Call Release (IP and VRS)*

This service provision is out-dated for IP and VRS and the requirements should be reviewed for appropriateness. Call release is only appropriate for TTY calls.

#### *Speed Dialing (IP and VRS)*

CAC maintains a Client Profile/preference data base in which clients may store frequently called numbers. **Bill is this true????**

#### *Speech-to-Speech (IP)*

CAC technology is currently capable of supporting speech-to-speech service for IP relay. We have had no requests for this service.

#### *Ending Comments*

The waiver of certain TRS rules continues to be appropriate and necessary in order to foster the establishment and growth of strong IP and VRS providers. The waivers help us to offer functionally equivalent access to the telecommunications system that has been available to hearing individuals for many years. As the industry has developed, some of the

previously waived rules have been implemented. We believe this is as it should be in that the Commission recognizes that industry growth and expansion enhance the ability of providers to meet requirements that they initially could not. In order to nurture continued research and development associated with needed technology and to encourage improvements in the delivery of IP and VRS services, adequate funding should be made available in support of ongoing research and development. Continued research and development will support enhanced capacity to meet applicable standards that address the provision of VRS and IP services. We believe that adequate funding in this regard is best accomplished through the designation of funds for research, or through increases in per-minute reimbursement rates for IP and VRS services.

Respectfully Submitted,

**COMMUNICATION ACCESS CENTER FOR THE DEAF AND HARD OF  
HEARING, Inc.**

Respectfully Submitted by:

Debra L. MacLean

CACDHH

